

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CHRIS NEWMAN

07-CV-5622 [DAB]

Plaintiff,
-against-

**NOTICE OF
MOTION FOR
ADMISSION
PRO HAC VICE**

METRO NORTH COMMUTER RAILROAD, JONES
LANG LASALLE,

Defendants.
-----X

625174 8-22-8 SCB 141569
PLEASE TAKE NOTICE, that upon the annexed attorney affirmation of Michael H. Zhu, affidavit of Rudolph V. DeGeorge, II, Esq, in support of this Motion and the Certificate of Good Standing annexed thereto, that on _____, 2007 the undersigned will move this Court before the Honorable Deborah A. Batts, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.13(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York for an Order allowing the admission of movant, Rudolph V. DeGeorge, II, Esquire a member in good standing of the Bar of Pennsylvania, an attorney pro hac to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against either Mr. DeGeorge or your affirmant in any State or Federal Court.

Dated: New York, New York
August 22, 2007

Michael H. Zhu, Esq., P.C.

BY:



Michael Zhu, Esquire
Attorneys for Plaintiff
Chris Newman
14 Wall Street, 22nd Floor
New York, New York 10005
(212) 227-2245

TO: Ioana Wenchell, Esq.
Metro-North Commuter Railroad
347 Madison Avenue
New York, New York 10017

Jones Lang LaSalle,
25 Vanderbilt Avenue
New York, NY 10017

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHRIS NEWMAN

Plaintiff,

-against-

METRO NORTH COMMUTER RAILROAD, JONES
LANG LASALLE,

Defendants.
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07-CV-5622 [DAB]

**AFFIRMATION IN
SUPPORT OF
MOTION FOR
ADMISSION
PRO HAC VICE**

Michael H. Zhu, an attorney duly admitted to practice before the United States District Court in the Southern District of New York, respectfully affirms under the penalties of perjury, as follows:

1. I am co-counsel for Plaintiff. As such, I am familiar with the pleadings and proceedings in this action.

2. I submit this Affirmation in support of the instant motion for an order pursuant to Local Rule 1.13(c) for the admission *pro hac vice* of Rudolph V. DeGeorge, Esquire to participate in the discovery, trial or argument of this particular action, together with such other and further relief as this Court may deem just and proper.

3. I have known the Barish Rosenthal and the candidate Rudolph DeGeorge for more than one year professionally, and can attest to his good character and moral standing and, as such, hereby move for Mr. DeGeorge's admission to the bar of this

court for the purpose of co-representing the Plaintiff in this matter.

4. Rudolph V. DeGeorge, Esquire has sworn that he is familiar with and will comply with the standards of professional conduct imposed upon members of the New York Bar, including the rules of court governing the conduct of attorneys and the Disciplinary Rules of the Code of Professional Responsibility.

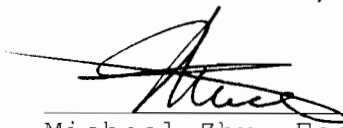
5. Mr. DeGeorge has been a member of the bar of the Commonwealth of Pennsylvania since November 23, 1987.

6. Mr. DeGeorge has never been subject to disciplinary proceeding in any jurisdiction and is a member in good standing in the aforesaid Court as reflected in the attached Certificate of Good Standing issued by the Supreme Court of Pennsylvania, marked as Exhibit "A" to Mr. DeGeorge's accompanying Affidavit.

Dated: New York, New York
August 22, 2007

Michael H. Zhu, Esq., P.C.

BY:



Michael Zhu, Esquire
Attorneys for Plaintiff
Chris Newman
14 Wall Street, 22nd Floor
New York, New York 10005
(212) 227-2245

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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-against-

AFFIDAVIT

METRO NORTH COMMUTER RAILROAD, JONES
LANG LASALLE

Defendants.
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Rudolph V. DeGeorge, II, Esquire, being duly sworn, hereby
deposes and says as follows:

1. I am a practitioner of the law firm of Barish
Rosenthal, 1717 Arch Street, Philadelphia, Pennsylvania since

2. I submit this affidavit in support of my motion for
admission to practice *pro hac vice* in the above-captioned
matter.

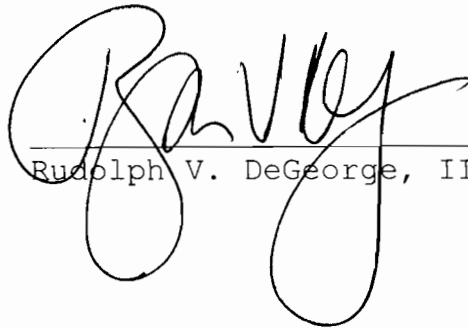
3. As shown in the Certificate of Good Standing annexed
hereto, I am a member in good standing of the bar of the Supreme
Court of Pennsylvania.

4. There are no pending disciplinary proceedings against
me in any State or Federal Court.

5. Annexed hereto as Exhibit "A" is a Certificate of Good
Standing from the Supreme Court of Pennsylvania.


6. Wherefore your Affiant respectfully submits that I
should be permitted to appear as Counsel and advocate *pro hac*

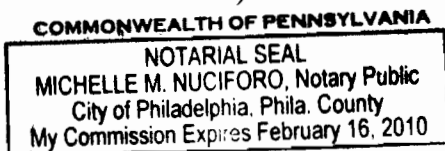
vice in this case.


Rudolph V. DeGeorge, II, Esq.

Dated: Philadelphia, PA
August 17, 2007

Sworn to and before me this 17
day of August, 2007.


Notary Public





Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Rudolph V. DeGeorge, II, Esq.

DATE OF ADMISSION

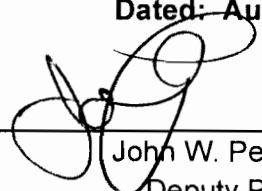
November 23, 1987

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 10, 2007



John W. Person, Jr., Esq.
Deputy Prothonotary

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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07-CV-5622 [DAB]

Plaintiff,
-against-

**ORDER FOR
ADMISSION
PRO HAC VICE**

METRO NORTH COMMUTER RAILROAD,
JONES LANG LaSALLE

Defendants.
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AND NOW, this ____ day of, 2007 upon consideration of Mr. Rudolph V. DeGeorge, II, Esq, Motion for Admission Pro Hac Vice, pursuant to Local Rule 1.13(c), and any response thereto, said Motion is **GRANTED**.

BY THE COURT:

U.S.D.J.

AFFIRMATION OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing NOTICE OF MOTION FOR ADMISSION PRO HAC VICE, ATTORNEY'S AFFIRMATION AND AFFIDAVIT to defendants was served by first-class mail, postage prepaid, upon:

Ioana Wenchell, Esq.
Metro-North Commuter Railroad
347 Madison Avenue
New York, New York 10017

Jones Lang LaSalle,
25 Vanderbilt Avenue
New York, NY 10017

on this 22nd day of August, 2007.

Michael H. Zhu, Esq. PC
Attorneys for
Plaintiff Chris Newman

By: 

Michael H. Zhu

14 Wall Street - 22nd Floor
New York, New York 10005-1198
(212) 227-2245